

LAW OFFICES OF
MICHAEL M. COHEN
275 WALTON STREET
ENGLEWOOD, NEW JERSEY 07631

201.227.0881 T / 201.227.0882 F

June 13, 2011

CM/ECF

Federal District Court Clerk
Federal Court, District of New Jersey
Martin Luther King, Jr. Federal Building and Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Liafom, LLC et al v. Big Fresh Pictures et al
Federal District Court, D.N.J. 10-00606 (JLL)

Please find a Notice of Subpoena and Subpoenas for Go Daddy, IMDB, Network Solutions and Linked In. Also please find Notices of Deposition and To Produce, and Subpoenas for Djida Oppenheim, a former "associate" with the former Big Fresh Productions, Inc., and Jay Kenoff, Danielle Amato-Milligan, Grant Raynham, and Laura Siegel, the former "Consulting Partners" at Big Fresh Pictures.

Respectfully submitted,



Michael M. Cohen

cc: The Honorable Jose L. Lenares USFM, CM/ECF
The Honorable Claire C. Checci, USMJ, CM/ECF
Dennis A. Cipriano, Esq., CM/ECF, Certified Mail
Jeff Oppenheim, Certified Mail

MMC/xaj

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

LIAFOM, LLC and
AARON ABDELHAK,

Plaintiffs,

vs.

BIG FRESH PICTURES, BIG FRESH
PRODUCTIONS, JEFF OPPENHEIM,
LLOYD CHREIN, LEO LEICHTER,
SANDI CASTRO, AND JOHN DOE

Defendants.

NOTICE OF DEPOSITION FOR LAURA
SIEGEL

CIVIL ACTION NO. 2:2010CV00606

JURY TRIAL DEMANDED

To Defendants:


Please take notice, under Federal Rules of Civil Procedure 30 and 45, that counsel for Plaintiffs will take the deposition of **Laura Siegel**, whose address is c/o Creative Entertainment Connections, 127 West 26th Street, Suite 1207, New York, NY 10001, will be taken by oral examination before a notary public, or some other officer duly authorized by law to take deposition, on ~~June 28~~²⁷, 2011 at ~~10:00~~¹¹ a.m. at the following address:

~~493~~^{MMA} Teaneck Rd.

Teaneck, NJ 07666

The deposition will be recorded stenographically, by audio means, or by both methods. Plaintiffs are also requesting that the deponent bring the documents identified on the attached **subpoena**.

This 10th of June, 2011.


Michael M. Cohen, Esq.
275 Walton Street

Englewood, New Jersey 07631
T (201) 227-0881
F (201) 227-0882
Attorney for Plaintiffs
MC 2254

AO 88A (Rev 06/09) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of New Jersey

Liafom, LLC & Aaron Abdelhak

Plaintiff

v.

Big Fresh Pictures, Big Fresh Productions, Jeff
Oppenheim, et al.

Defendant

Civil Action No. 10-606(JLL)

(If the action is pending in another district, state where:

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Laura Siegel, c/o Creative Entertainment Connections, 127 West 26th Street, Suite 1207
New York, NY 10001

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: 493 Teaneck Rd., Teaneck, NJ 07666

Date and Time: 27

06/30/2011 11:00 am

The deposition will be recorded by this method: stenographically, audio means, or both.

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

All correspondence associated with Big Fresh Pictures for the past two years, whether such correspondence was sent by you, received by you, or is in your custody, possession, or control.

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 6/10/2011

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) Liafom, LLC & Aaron Abdelhak, who issues or requests this subpoena, are:

Michael M. Cohen, 275 Walton St., Englewood, NJ 07631
201-227-0881
midtownlawyer@aol.com

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

LIAFOM, LLC and
AARON ABDELHAK,

Plaintiffs,

vs.

BIG FRESH PICTURES, BIG FRESH
PRODUCTIONS, JEFF OPPENHEIM,
LLOYD CHREIN, LEO LEICHTER,
SANDI CASTRO, AND JOHN DOE

Defendants.

NOTICE OF DEPOSITION OF GRANT
RAYNHAM

CIVIL ACTION NO. 2:2010CV00606

JURY TRIAL DEMANDED

To Defendants:

Please take notice, under Federal Rules of Civil Procedure 30 and 45, that counsel for Plaintiffs will take the deposition of **Grant Raynham**, whose address is 1617 Cosmo Street, Suite 212, Los Angeles, CA 90028-6347, will be taken by oral examination before a notary public, or some other officer duly authorized by law to take deposition, on **June 27, 2011** at **2:00 p.m.** at the following address:

1617 Cosmo Street

Suite 212

Los Angeles, CA 90028-6347

The deposition will be recorded stenographically, by audio means, or by both methods. The deposition may also be taken telephonically or by other remote means under Federal Rule of Civil Procedure 30. Plaintiffs are also requesting that the deponent bring the documents identified on the attached **subpoena**.

This 10th of June, 2011.

3 PM
2:00
MMA



Michael M. Cohen, Esq.
275 Walton Street
Englewood, New Jersey 07631
T (201) 227-0881
F (201) 227-0882
Attorney for Plaintiffs
MC 2254

AO 88A (Rev. 06/09) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

Liafom, LLC & Aaron Abdelhak

Plaintiff

v.

Big Fresh Pictures, Big Fresh Productions, Jeff
Oppenheim, et al.

Defendant

Civil Action No. 10-606(JLL)

(If the action is pending in another district, state where:
District of New Jersey)

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Grant Raynham, 1617 Cosmo Street, Suite 212, Los Angeles, CA 90028-6347

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: 1617 Cosmo Street, Suite 212, Los Angeles, CA
90028-6347Date and Time: 27 3PM
06/30/2011 2:00 pm

wme

The deposition will be recorded by this method: stenographically, audio means, or both.

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

All correspondence associated with Big Fresh Pictures for the past two years, whether such correspondence was sent by you, received by you, or is in your custody, possession, or control.

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 6/14/2011

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) Liafom, LLC &

Aaron Abdelhak

Michael M. Cohen, 275 Walton St., Englewood, NJ 07631

201-227-0881

midtownlawyer@aol.com

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

**LIAFOM, LLC and
AARON ABDELHAK,**

Plaintiffs,

vs.

**BIG FRESH PICTURES, BIG FRESH
PRODUCTIONS, JEFF OPPENHEIM,
LLOYD CHREIN, LEO LEICHTER,
SANDI CASTRO, AND JOHN DOE**

Defendants.

**NOTICE OF DEPOSITION FOR JAY
KENOFF**

CIVIL ACTION NO. 2:2010CV00606

JURY TRIAL DEMANDED

To Defendants:

Please take notice, under Federal Rules of Civil Procedure 30 and 45, that counsel for Plaintiffs will take the deposition of **Jay Kenoff**, whose address is c/o Kenoff & Machtinger, LLP, 1801 Century Park East, Suite 1520, Los Angeles, CA 90067, will be taken by oral examination before a notary public, or some other officer duly authorized by law to take deposition, on **June 27, 2011 at 10:00 a.m.** at the following address:

Kenoff & Machtinger, LLP

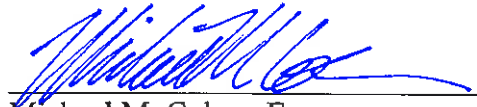
1801 Century Park East

Suite 1520

Los Angeles, CA 90067

The deposition will be recorded stenographically, by audio means, or by both methods. The deposition may also be taken telephonically or by other remote means under Federal Rule of Civil Procedure 30. Plaintiffs are also requesting that the deponent bring the documents identified on the attached **subpoena**.

This _____ of June, 2011.



Michael M. Cohen, Esq.
275 Walton Street
Englewood, New Jersey 07631
T (201) 227-0881
F (201) 227-0882
Attorney for Plaintiffs
MC 2254

AO 88A (Rev. 06/09) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

Liafom, LLC & Aaron Abdelhak

Plaintiff

v.

Big Fresh Pictures, Big Fresh Productions, Jeff
Oppenheim, et al.

Defendant

Civil Action No. 10-606(JLL)

(If the action is pending in another district, state where:
District of New Jersey)

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Jay Kenoff, c/o Kenoff & Machtinger, LLP, 1801 Century Park East, Suite 1520,
Los Angeles, CA 90067

☒ **Testimony:** **YOU ARE COMMANDED** to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Kenoff & Machtinger, LLP, 1801 Century Park East,
Suite 1520, Los Angeles, CA 90067Date and Time: 27 1 PM
06/30/2011 12:00 pmThe deposition will be recorded by this method: stenographically, audio means, or both. MMLC

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

All correspondence associated with Big Fresh Pictures for the past two years, whether such correspondence was sent by you, received by you, or is in your custody, possession, or control.

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 6/10/2011

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) Liafom, LLC & Aaron Abdelhak, who issues or requests this subpoena, are:

Michael M. Cohen, 275 Walton St., Englewood, NJ 07631
201-227-0881
midtownlawyer@aol.com

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

LIAFOM, LLC and
AARON ABDELHAK,

Plaintiffs,

vs.

BIG FRESH PICTURES, BIG FRESH
PRODUCTIONS, JEFF OPPENHEIM,
LLOYD CHREIN, LEO LEICHTER,
SANDI CASTRO, AND JOHN DOE

Defendants.

NOTICE OF DEPOSITION FOR
DANIELLE AMATO MILLIGAN

CIVIL ACTION NO. 2:2010CV00606

JURY TRIAL DEMANDED

To Defendants:


Please take notice, under Federal Rules of Civil Procedure 30 and 45, that counsel for Plaintiffs will take the deposition of **Danielle Amato Milligan**, whose address is c/o Amato Milligan & Associates, 304 Park Avenue South, 11th Floor, New York, NY 10010, will be taken by oral examination before a notary public, or some other officer duly authorized by law to take deposition, on June ²⁷~~23~~, 2011 at ^{9 AM}~~2:00 p.m.~~ at the following address:

493 Teaneck Rd.

Teaneck, NJ 07666

The deposition will be recorded stenographically, by audio means, or by both methods. Plaintiffs are also requesting that the deponent bring the documents identified on the attached **subpoena**.

This 27th of June, 2011.



Michael M. Cohen, Esq.
275 Walton Street

Englewood, New Jersey 07631
T (201) 227-0881
F (201) 227-0882
Attorney for Plaintiffs
MC 2254

AO 88A (Rev. 06/09) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of New Jersey

Liafom, LLC & Aaron Abdelhak

Plaintiff

v.

Big Fresh Pictures, Big Fresh Productions, Jeff
Oppenheim, et al.*Defendant*

Civil Action No. 10-606(JLL)

(If the action is pending in another district, state where:


SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Danielle Amato Milligan, c/o Amato Milligan & Associates, 304 Park Avenue South, 11th Floor,
New York, NY 10010

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: 493 Teaneck Rd., Teaneck, NJ 07666

Date and Time:

27 9 AM
06/30/2011 1:00 pmThe deposition will be recorded by this method: stenographically, audio means, or both. 

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

All correspondence associated with Big Fresh Pictures for the past two years, whether such correspondence was sent by you, received by you, or is in your custody, possession, or control.

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date:

6/10/2011

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) Liafom, LLC &

Aaron Abdelhak

, who issues or requests this subpoena, are:

Michael M. Cohen, 275 Walton St., Englewood, NJ 07631

201-227-0881

midtownlawyer@aol.com

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

LIAFOM, LLC and
AARON ABDELHAK,

Plaintiffs,

vs.

BIG FRESH PICTURES, BIG FRESH
PRODUCTIONS, JEFF OPPENHEIM,
LLOYD CHREIN, LEO LEICHTER,
SANDI CASTRO, AND JOHN DOE

Defendants.

NOTICE OF DEPOSITION FOR DJIDA
OPPENHEIM

CIVIL ACTION NO. 2:2010CV00606

JURY TRIAL DEMANDED

To Defendants:

Please take notice, under Federal Rules of Civil Procedure 30 and 45, that counsel for Plaintiffs will take the deposition of **Djida Oppenheim**, whose address is 1641 3rd Avenue, Apartment 24K, New York, NY 10128, will be taken by oral examination before a notary public, or some other officer duly authorized by law to take deposition, on ~~June 21~~²⁸, 2011 at ~~10:00~~^{9AM} a.m. at the following address:

493 Teaneck Rd.

Teaneck, NJ 07666

The deposition will be recorded stenographically, by audio means, or by both methods. Plaintiffs are also requesting that the deponent bring the documents identified on the attached **subpoena**.

This 10th of June, 2011.



Michael M. Cohen, Esq.
275 Walton Street

Englewood, New Jersey 07631
T (201) 227-0881
F (201) 227-0882
Attorney for Plaintiffs
MC 2254

AO 88A (Rev 06/09) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of New Jersey

Liafom, LLC & Aaron Abdelhak

Plaintiff

v.

Big Fresh Pictures, Big Fresh Productions, Jeff
Oppenheim, et al.

Defendant

Civil Action No. 10-606(JLL)

(If the action is pending in another district, state where:

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Djida Oppenheim, 1641 3rd Avenue, Apt. 24K, New York, NY 10128

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: 493 Teaneck Rd., Teaneck, NJ 07666

Date and Time: ^{MAC} 28

06/24/2011 9:00 am

The deposition will be recorded by this method: stenographically, audio means, or both.

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

Provide all records created by you, received by you or presently available to you regarding the film Aaron Loves Kendra. The documents requested include, but are not limited to, electronically stored information, correspondence, memos, emails, bank statements, and company records.

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 6/10/2011

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) Liafom, LLC & Aaron Abdelhak, who issues or requests this subpoena, are:

Michael M. Cohen, 275 Walton St., Englewood, NJ 07631

201-227-0881

midtownlawyer@aol.com

AO 88B (Rev. 06/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Arizona

Liaform, LLC & Aaron Abdelhak

Plaintiff

v.

Big Fresh Pictures, Big Fresh Productions, Jeff
Oppenheim, et al.*Defendant*

Civil Action No. 10-606(JLL)

(If the action is pending in another district, state where:

District of New Jersey)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTIONTo: GoDaddy.com, Inc., 14455 North Hayden Road, Suite 219, Scottsdale, AZ 85260
c/o Registered Agent, Sherry Delgado☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: See Exhibit 1.Place: 14455 North Hayden Road, Suite 210, Scottsdale, AZ
85260

Date and Time:

06/30/2010 1:00 pm

☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date:

6/10/2011

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk_____
Attorney's signatureThe name, address, e-mail, and telephone number of the attorney representing (name of party) Liaform, LLC & Aaron Abdelhak, who issues or requests this subpoena, are:Michael M. Cohen, 275 Walton St., Englewood, NJ 07631
201-227-0881
midtownlawyer@aol.com

Exhibit 1 to Subpoena to GoDaddy.com, Inc.

- (1) Beginning and end date during which there were at least 3 web pages hosted Big Fresh Pictures (bigfreshpictures.com) and Big Fresh Productions Inc. (bigfreshproductions.com), and Chrein.com (chrein.com):
- (2) List of email addresses using these domains during the past two years.
- (3) The name, address, phone number, and email address of all persons registering, paying for, renewing, or transferring the domains.
- (4) Web pages published and appearing on the website reached at these domains, or otherwise appearing on the internet.

AO 88B (Rev. 06/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

Liafom, LLC & Aaron Abdelhak

Plaintiff

v.

Big Fresh Pictures, Big Fresh Productions, Jeff
Oppenheim, et al.*Defendant*

Civil Action No. 10-606(JLL)

(If the action is pending in another district, state where:

District of New Jersey)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTIONTo: Network Solutions, LLC, c/o Corporation Service Co., Bank of America Center, 16th Floor, 1111 East Main St.,
Richmond, VA 23219☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: See Exhibit 1.Place: 13861 Sunrise Valley Drive, Ste. 300
Herndon, VA 20171

Date and Time:

06/30/2011 3:00 pm

☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date:

6/10/2011

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk_____
Attorney's signatureThe name, address, e-mail, and telephone number of the attorney representing (name of party) Liafom, LLC & Aaron Abdelhak, who issues or requests this subpoena, are:Michael M. Cohen, 275 Walton St., Englewood, NJ 07631
201-227-0881
midtownlawyer@aol.com

Exhibit 1 to Subpoena to Network Solutions

(1) Beginning and end date during which there were at least 3 web pages hosted Big Fresh Pictures (bigfreshpictures.com) and Big Fresh Productions Inc. (bigfreshproductions.com), and Chrein.com (chrein.com):

(2) List of email addresses using these domains during the past two years.

(3) The name, address, phone number, and email address of all persons registering, paying for, renewing, or transferring the domains.

(4) Web pages published and appearing on the website reached at these domains, or otherwise appearing on the internet.

AO 88B (Rev. 06/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Northern District of California

Liafom, LLC & Aaron Abdelhak

Plaintiff

v.

Big Fresh Pictures, Big Fresh Productions, Jeff
Oppenheim, et al.*Defendant*

Civil Action No. 10-606(JLL)

(If the action is pending in another district, state where:
District of New Jersey)SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTIONTo: LinkedIn Corporation, c/o Lawyers Incorporating Service, 2730 Gateway Oaks Drive, Ste. 100
Sacramento, CA 95833

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: See Exhibit 1.

Place: 2029 Stierlin Court, Mountain View, CA 94043

Date and Time:

06/30/2011 10:00 am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date:

6/10/2011

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk


Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) Liafom, LLC & Aaron Abdelhak, who issues or requests this subpoena, are:

Michael M. Cohen, 275 Walton St., Englewood, NJ 07631
201-227-0881
midtownlawyer@aol.com

Exhibit 1 to Subpoena to LinkedIn Corporation

(1) All postings regarding Big Fresh Pictures made or removed and date thereof by the following people:

- Jeff Oppenheim (<http://www.linkedin.com/in/jeffoppenheim>)
- Leo Leichter (Partner Big Fresh Pictures)
- Lloyd Chrein (<http://www.linkedin.com/in/chrein>)
- Sandi Castro (<http://www.linkedin.com/pub/sandi-castro-migliaccio/1/284/748>)

(2) All documents showing all postings, edits, changes, or deletions regarding Big Fresh Pictures (company profile located at <http://www.linkedin.com/company/748434>).

(3) All documents showing address and contact information for Brian Joseph (Founder and CEO of Crossed Eyed Entertainment), and name, address, phone number, and email address of person who created his profile.

AO 88B (Rev. 06/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Washington

Liafom, LLC & Aaron Abdelhak

Plaintiff

v.

Big Fresh Pictures, Big Fresh Productions, Jeff
Oppenheim, et al.*Defendant*

Civil Action No. 10-606(JLL)

(If the action is pending in another district, state where:
District of New Jersey)SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTIONTo: IMDb.com, Inc., c/o Corporation Service Co., 300 Deschutes Way SW, Ste. 304
Tumwater, WA 98501☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: See Exhibit 1.

Place: 410 Terry Ave. N., Seattle, WA 98109

Date and Time:

06/30/2011 1:00 pm

☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date:

6/10/2011

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk
*Attorney's signature*The name, address, e-mail, and telephone number of the attorney representing (name of party) Liafom, LLC & Aaron Abdelhak, who issues or requests this subpoena, are:Michael M. Cohen, 275 Walton St., Englewood, NJ 07631
201-227-0881
midtownlawyer@aol.com

Exhibit 1 to Subpoena to IMDb.com., Inc.

(1) All documents showing all postings and dates of those postings that were made relating to Big Fresh Productions, Big Fresh Pictures, or Changed Man.

(2) All documents showing all changes, including deletions or removals, and dates of such changes relating to Big Fresh Productions, Big Fresh Pictures, or Changed Man.

(3) The identity (including but not limited to name, user name, address, phone number, and email address), in whatever format available to IMDb.com, Inc., of each person that made or removed postings relating to Big Fresh Productions, Big Fresh Pictures, or Changed Man.

(4) All documents showing postings and deletions regarding Jeff Oppenheim, Leo Leichter, Sandi Castro and Lloyd Chrein, and dates thereof.